City of Fort Worth, Texas Additional Comments on FCC Public Notice Seeking Comment on The Transition Process for 700 MHz Public Safety Waiver Recipients

(DA 12-555, released April 6, 2012)

PS Docket No. 12-94

Submission Date: July 13, 2012

The State of Texas' July 6, 2012 letter to clarify the position and intent of the State accurately reflects all communications and planning that has been done. In the City of Fort Worth's experience, the State has proactively, aggressively and fairly worked with all interested jurisdictions to ensure requirements are being met and any work being done is consistent with interoperability standards. They have gone "above and beyond" in their efforts to support local jurisdictions and ensure the State is ready and able to support the nationwide network.

From a practical perspective, Fort Worth's BigNET Public Safety LTE network is complete. The equipment procured by Fort Worth is a virtual extension of the Harris County, Texas System. As such, it complies with the current architecture guidelines and is consistent with technology standards and processes. Equipment has been delivered and the network design and site identification has been completed. The significant outstanding tasks: communications circuits, interlocal agreements, and final facility tasks are scheduled for completion.

Fort Worth currently uses a commercial 3G wireless solution. While this system does provide important capabilities to Public Safety, insufficient coverage, capacity and reliability have been recurring issues since deployment five years ago. The opportunity to carefully leverage the capabilities from the Harris County BigNET system has tremendous benefits. It will allow Fort Worth to address specific major pain points such as capacity issues at large scale public events immediately. It will serve to test and validate the Texas architecture. Finally, it also will provide FirstNet operational lessons learned to ensure an even smoother nationwide deployment.

Fort Worth has funded this project with local funds due to its critical nature. If in the future, architecture changes Fort Worth will continue to work with regional partners, State and Federal agencies to ensure compliance with the developed FirstNet architecture and standards.